

**UNITED STATES OF AMERICA,** )  
 )  
 **v.** )  
 )  
 **GLEN CASADA and** )  
 **CADE COTHREN,** )  
 )  
 **Defendants.** )

**DEFENDANT CADE COTHREN’S MOTION TO EXTEND DEADLINES FOR  
PRETRIAL MOTIONS AND TO DISCLOSE EXPERT WITNESSES**

1. The deadline for Mr. Cothren to file pretrial motions is July 25, 2023 (Doc. No. 49).
2. The deadline for the parties to disclose expert witnesses is July 31, 2023 (Doc. No. 49).
3. The government produced additional discovery on July 20, 2023.
4. In addition to the government's most recent production, the government represented on July 24, 2023 that Mr. Cothren should expect "additional rolling production as [they] receive additional records from the FBI."
5. Mr. Cothren requires time to review and analyze the supplemental discovery productions and determine if any pretrial motions and/or expert witnesses are necessary.

6. Undersigned counsel has conferred with Trial Attorney for the United States Department of Justice John Taddei who states that the government does not oppose Mr. Cothren's Motion to extend the above-referenced deadlines until August 24, 2023.

7. Mr. Cothren does not waive any right to seek further relief from the Court necessitated from the government's recent as well as expected "rolling" discovery production.

For all the above reasons, Mr. Cothren respectfully requests this Court enter an Order extending the deadlines for Mr. Cothren to file pretrial motions and to disclose expert witnesses until August 24, 2023.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been served on the following via the Court's CM/ECF system to:

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on this the 24th day of July 2023.

/s/ Cynthia A. Sherwood